

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

IN RE: HAIR RELAXER MARKETING, SALES PRACTICES, AND PRODUCTS LIABILITY LITIGATION	MDL No. 3060 Master Docket Case No. 1:23-cv-00818 Honorable Mary M. Rowland
FELICIA FULLARD  Plaintiff,  v.  AVLON INDUSTRIES, and GODREJ SON HOLDINGS, INC., and L'ORÉAL USA, INC., and L'ORÉAL USA PRODUCTS, INC., and LUSTER PRODUCTS, INC., and REVLON CONSUMER PRODUCTS CORPORATION, and REVLON GROUP HOLDINGS LLC, and REVLON, INC., and SOFTSHEEN-CARSON LLC, and STRENGTH OF NATURE, LLC  Defendants.	SHORT-FORM COMPLAINT AND JURY DEMAND   Civil Action No.

1. Plaintiff/Injured Party (hereinafter, "Plaintiff") incorporate by reference Plaintiffs' Master Long Form Complaint in *In Re: Hair Relaxer Marketing, Sales Practices and Products Liability Litigation*, MDL 3060, filed as of May 15, 2023, as Document Number 106.

2. Plaintiff, Felicia Fullard, files this Complaint pursuant to CMO No. 2 and is to be bound by the rights, protections and privileges, and obligations of that CMO and other Orders of the Court. Further, in accordance with CMO No. 2, Plaintiff hereby designates the United States District Court for the District of Maryland as Plaintiff's designated venue ("Original Venue"). Plaintiff makes this selection based upon one or more of the following factors:

X Plaintiff currently resides in La Plata, Maryland;

X Plaintiff purchased and used Defendant(s)' products in Maryland;

\_\_\_\_\_ The Original Venue is a judicial district in which Defendant \_\_\_\_\_ resides, and all defendants are residents of the State in which the district is located (28 U.S.C. § 1391(b)(1)).

\_\_\_\_\_ The Original Venue is a judicial district in which a substantial part of the events or omissions giving rise to the claim occurred, specifically (28 U.S.C. § 1391(b)(2)):

\_\_\_\_\_.

\_\_\_\_\_ There is no district in which an action may otherwise be brought under 28 U.S.C. § 1391, and the Original Venue is a judicial district in which Defendant \_\_\_\_\_ is subject to the Court's personal jurisdiction with respect to this action (28 U.S.C. § 1391(b)(3)).

\_\_\_\_\_ Other reason (please explain): \_\_\_\_\_.

3. For purposes of diversity jurisdiction, Plaintiff is a citizen of Maryland.

4. Plaintiff is suing the following Defendants, and for purposes of diversity, whose State of Incorporation/Formation and Principal Place of Business is as follows:

Check All Applicable Defendants	Defendant	State of Incorporation or Formation	Principal Place of Business
<input type="checkbox"/>	AFAM Concept, Inc. d/b/a JF Labs, Inc.	Illinois	Illinois
<input checked="" type="checkbox"/>	Avlon Industries	Illinois	Illinois
<input type="checkbox"/>	Beauty Bell Enterprises LLC f/k/a House of Cheatham, Inc.	Georgia	Georgia
<input type="checkbox"/>	Dabur International Ltd.	Isle of Man	Dubai
<input type="checkbox"/>	Dabur International USA Ltd.	India	Illinois
<input type="checkbox"/>	Dermoviva Skin Essentials, Inc.	Delaware	New Jersey
<input checked="" type="checkbox"/>	Godrej SON Holdings, Inc.	Georgia	Georgia
<input type="checkbox"/>	House of Cheatham LLC	Delaware	Georgia
<input checked="" type="checkbox"/>	L'Oréal USA, Inc.	Delaware	New York
<input checked="" type="checkbox"/>	L'Oréal USA Products, Inc.	Delaware	New York
<input checked="" type="checkbox"/>	Luster Products, Inc.	Illinois	Illinois
<input type="checkbox"/>	McBride Research Laboratories, Inc.	Georgia	Georgia

Check All Applicable Defendants	Defendant	State of Incorporation or Formation	Principal Place of Business
<input type="checkbox"/>	Namaste Laboratories LLC	Illinois	Illinois
<input checked="" type="checkbox"/>	Revlon Consumer Products Corporation	Delaware	New York
<input checked="" type="checkbox"/>	Revlon Group Holdings LLC	Delaware	Delaware
<input checked="" type="checkbox"/>	Revlon, Inc.	Delaware	New York
<input checked="" type="checkbox"/>	SoftSheen-Carson LLC	New York	New York
<input checked="" type="checkbox"/>	Strength of Nature, LLC	Georgia	Georgia
<input type="checkbox"/>	Other (Please identify): _____	_____	_____
<input type="checkbox"/>	Other (Please identify): _____	_____	_____
<input type="checkbox"/>	Other (Please identify): _____	_____	_____

**CASE SPECIFIC FACTS REGARDING  
HAIR RELAXER PRODUCT USE AND INJURIES**

5. Upon information and belief, Plaintiff began using hair relaxer products on or about the following date: January 1, 1982, and if applicable, stopped using hair relaxer products on or about the following date: August 31, 2020.

6. Upon information and belief, Plaintiff used the following hair relaxer products, which Plaintiff contends caused and/or contributed to their injuries and brings claims against the following Defendants:

Defendant	Product List (Select All Applicable Products)
<b><u>AFAM Concept, Inc.</u></b> <b><u>d/b/a JF Labs, Inc.</u></b>	<input type="checkbox"/> Hawaiian Silky - Crème Conditioning No Lye Silky Smooth Sheen Relaxer <input type="checkbox"/> Hawaiian Silky - Herbal No Lye Conditioning Relaxer System with Tea Tree & Avocado Oil - 2 Applications <input type="checkbox"/> Vitale - Olive Oil Anti-Breakage Relaxer No Base with Shea Butter - Regular Strength

Defendant	Product List (Select All Applicable Products)
	<input type="checkbox"/> Vitale Pro - New Texture Salon Exclusive Hair Relaxer <input type="checkbox"/> Vitale Mo'Body - Shea Butter Sensitive Scalp Relaxer with Oatmeal Protein <input type="checkbox"/> Vitale - Life and Body - Hair Relaxer with Aloe Vera - Smooth Silky Texture <input type="checkbox"/> Other (please specify): _____
<b><u>Avlon Industries, Inc.</u></b>	<input checked="" type="checkbox"/> Affirm Crème Relaxer <input checked="" type="checkbox"/> Affirm Sensitive Scalp Relaxer <input checked="" type="checkbox"/> Affirm Dry & Itchy Scalp Relaxer <input checked="" type="checkbox"/> Affirm FiberGuard Conditioning Crème Relaxer <input checked="" type="checkbox"/> Affirm FiberGuard Sensitive Scalp Conditioning Relaxer <input type="checkbox"/> Other (please specify): _____
<b><u>Beauty Bell Enterprises, LLC f/k/a House of Cheatham, Inc.</u></b>	<input type="checkbox"/> Africa's Best Herbal Intensive No-Lye Relaxer System <input type="checkbox"/> Originals by Africa's Best Originals Olive Oil Conditioning Relaxer <input type="checkbox"/> Organics by Africa's Best Olive Oil Conditioning Relaxer System with Extra Virgin Olive Oil <input type="checkbox"/> Originals by Africa's Best Kids Originals Natural Conditioning Relaxer System <input type="checkbox"/> Organics by Africa's Best Kids Organic Conditioning Relaxer System <input type="checkbox"/> Organics by Africa's Best Kids Natural Conditioning Relaxer System <input type="checkbox"/> Texture My Way Men's Texturizing Kit <input type="checkbox"/> Texture My Way Women's Texturizing & Softening System <input type="checkbox"/> Other (please specify): _____
<b><u>House of Cheatham, LLC</u></b>	<input type="checkbox"/> Africa's Best Herbal Intensive No-Lye Relaxer System <input type="checkbox"/> Originals by Africa's Best Originals Olive Oil Conditioning Relaxer <input type="checkbox"/> Organics by Africa's Best Olive Oil Conditioning Relaxer System with Extra Virgin Olive Oil <input type="checkbox"/> Originals by Africa's Best Kids Originals Natural Conditioning Relaxer System <input type="checkbox"/> Organics by Africa's Best Kids Organic Conditioning Relaxer System <input type="checkbox"/> Organics by Africa's Best Kids Natural Conditioning Relaxer System <input type="checkbox"/> Texture My Way Men's Texturizing Kit <input type="checkbox"/> Texture My Way Women's Texturizing & Softening System <input type="checkbox"/> Other (please specify): _____
<b><u>L'Oréal USA, Inc./ L'Oréal USA Products, Inc./ SoftSheen-Carson LLC</u></b>	<input checked="" type="checkbox"/> Dark and Lovely Beautiful Beginnings No-Mistake Smooth Relaxer <input checked="" type="checkbox"/> Dark and Lovely Beautiful Beginnings No Mistake Curl Softener <input checked="" type="checkbox"/> Dark and Lovely Healthy Gloss 5 Shea Moisture No Lye Relaxer <input checked="" type="checkbox"/> Dark and Lovely Triple Nourished Silkening Relaxer <input checked="" type="checkbox"/> Optimum Salon Haircare Defy Breakage No-Lye Relaxer

Defendant	Product List (Select All Applicable Products)
	<input checked="" type="checkbox"/> Optimum Salon Haircare Amla Legend Relaxer <input checked="" type="checkbox"/> Optimum Care Bodifying Relaxer <input checked="" type="checkbox"/> Optimum Multi-Mineral Reduced pH Crème Relaxer <input checked="" type="checkbox"/> Bantu No Base Relaxer <input type="checkbox"/> Ultra Precise No-Lye Conditioning Relaxer <input checked="" type="checkbox"/> Mizani Butter Blend Relaxer <input checked="" type="checkbox"/> Mizani Butter Blend Sensitive Scalp Relaxer <input checked="" type="checkbox"/> Mizani Butterblend Prosolvent Relaxer <input checked="" type="checkbox"/> Mizani Classic Relaxer <input checked="" type="checkbox"/> Mizani Sensitive Scalp Relaxer <input type="checkbox"/> Care Free Curl – Cold Wave Chemical Rearranger Super Strength <input type="checkbox"/> Look of Radiance Permanent Crème Relaxer Kit <input type="checkbox"/> Other (please specify): _____
<b><u>Luster Products Company</u></b>	<input checked="" type="checkbox"/> Luster's Pink Oil Moisturizer No-Lye Conditioning Relaxer <input checked="" type="checkbox"/> Luster's Pink Oil Moisturizer Short Looks Texturizer <input checked="" type="checkbox"/> Luster's Pink Oil Moisturizer Smooth Touch Relaxer <input checked="" type="checkbox"/> PCJ Kit <input checked="" type="checkbox"/> PCJ No Lye Kit - Adult <input checked="" type="checkbox"/> PCJ No Lye Kit - Children's <input type="checkbox"/> ShortLooks Colorlaxer Diamond Black <input type="checkbox"/> ShortLooks Colorlaxer Passion Red <input type="checkbox"/> ShortLooks Colorlaxer Sable Brown <input type="checkbox"/> Other (please specify): _____
<b><u>McBride Research Laboratories</u></b>	<input type="checkbox"/> Design Essentials Honey Nectar Relaxer Kit - Time Release Regular Strength <input type="checkbox"/> Design Essentials Sensitive Scalp Relaxer System <input type="checkbox"/> Design Essentials Regular Conditioning Relaxer <input type="checkbox"/> Other (please specify): _____
<b><u>Namaste Laboratories</u></b>	<input type="checkbox"/> ORS Olive Oil Built-In-Protection No-Lye Relaxer – Full Application <input type="checkbox"/> ORS Olive Oil No-Mix Salon Formula Crème Relaxer <input type="checkbox"/> ORS Olive Oil Ultra Nourish Crème Hair Relaxer <input type="checkbox"/> ORS Olive Oil Built-In-Protection No-Lye Relaxer – New Growth <input type="checkbox"/> ORS Olive Oil Zone Relaxer – Targeted Touch-Up No-Lye Hair Relaxer <input type="checkbox"/> ORS Olive Oil Curl Stretching Texturizer <input type="checkbox"/> ORS Olive Oil Crème on Crème Touch-Up No-Lye Hair Relaxer <input type="checkbox"/> ORS Olive Oil Mild Touch Relaxer with 60% Lower Chemical <input type="checkbox"/> ORS Olive Oil Texlax and Stretch Semi-Straightening System <input type="checkbox"/> ORS Olive Oil Girls Built-In Protection Plus No-Lye Conditioning Hair Relaxer System

Defendant	Product List (Select All Applicable Products)
	<input type="checkbox"/> ORS Olive Oil Girls Soft Curls No-Lye Crème Texture Softening System <input type="checkbox"/> ORS HAIRepair No-Lye Conditioning Relaxer System with Cuticle Shield <input type="checkbox"/> ORS Olive Oil Professional No-Lye Relaxer Kit <input type="checkbox"/> ORS Olive Oil Professional Crème Relaxer <input type="checkbox"/> Namasté Salon System Triple Emulsion Relaxer <input type="checkbox"/> Namasté Salon System Crème Relaxer <input type="checkbox"/> Namasté Salon System Conditioning Sensitive Scalp No-Lye Relaxer <input type="checkbox"/> Namasté Salon System Crème Relaxer Salon Trial Pack <input type="checkbox"/> (Other (please specify): _____).
<u><b>Revlon, Inc./ Revlon Consumer Products Corporation/ Revlon Group Holdings LLC/ Revlon</b></u>	<input checked="" type="checkbox"/> African Pride – No Lye Relaxer Kit <input checked="" type="checkbox"/> African Pride – No Base Relaxer <input checked="" type="checkbox"/> African Pride – Multi Length Texturizer Kit <input checked="" type="checkbox"/> African Pride – Dream Kids No Lye Relaxer Kit <input type="checkbox"/> All Ways Natural – No Lye Conditioning Crème Relaxer Kit <input type="checkbox"/> Aroschi Aromaphoric Relaxer System <input checked="" type="checkbox"/> Crème Of Nature Relaxer Cream <input checked="" type="checkbox"/> Crème Of Nature Relaxer Kit Argan Oil <input checked="" type="checkbox"/> Crème of Nature Herbarich Conditioning Crème Relaxer System Kit <input checked="" type="checkbox"/> Crème of Nature Herbarich Conditioning Crème Relaxer and Texturizing System <input checked="" type="checkbox"/> Crème of Nature Herbarich No Base Relaxer <input checked="" type="checkbox"/> Crème of Nature No Base Relaxer <input checked="" type="checkbox"/> Crème of Nature No Lye Relaxer <input checked="" type="checkbox"/> Crème of Nature Sodium Relaxer Kit <input checked="" type="checkbox"/> Crème Of Nature Cni No Lye Relaxer <input checked="" type="checkbox"/> Crème Of Nature Cni Sunflower & Coconut Oil - Creme <input checked="" type="checkbox"/> Crème Of Nature Eden Relaxer <input type="checkbox"/> Fabulaxer No-Lye Relaxer <input type="checkbox"/> Fabulaxer Gro-7 <input checked="" type="checkbox"/> Revlon Realistic No-Base Relaxer <input checked="" type="checkbox"/> Revlon Realistic No Lye Relaxer Kit <input type="checkbox"/> Other (please specify): _____).
<u><b>Strength of Nature, LLC</b></u>	<input checked="" type="checkbox"/> African Pride Olive Miracle Deep Conditioning Crème-on-Crème No Lye Relaxer 8 Salon Pack Touch-Ups <input checked="" type="checkbox"/> African Pride Olive Miracle Deep Conditioning Curls & Coils Texturizer <input checked="" type="checkbox"/> African Pride Olive Miracle Deep Conditioning Curls & Coils Texturizer With Aloe Deep Conditioner <input checked="" type="checkbox"/> African Pride Olive Miracle Deep Conditioning No-Lye Relaxer One Complete Application

Defendant	Product List (Select All Applicable Products)
	<input checked="" type="checkbox"/> African Pride Olive Miracle Deep Conditioning No-Lye Relaxer, One Complete Touch-Up <input checked="" type="checkbox"/> African Pride Shea Miracle Texture Softening Elongating System <input checked="" type="checkbox"/> African Pride Dream Kids Olive Miracle (4) Touch-Up Relaxer Kit <input checked="" type="checkbox"/> African Pride Dream Kids Olive Miracle Relaxer <input checked="" type="checkbox"/> African Pride Dream Kids Olive Miracle Touch-Up Relaxer Kit <input type="checkbox"/> Dr. Miracle's No Lye Relaxer Kit <input type="checkbox"/> Dr. Miracle's New Growth No-Lye Relaxer Kit <input type="checkbox"/> Elasta QP Normal Relaxer Kit <input type="checkbox"/> Elasta QP Normal Relaxer Kit 2 Applications <input type="checkbox"/> Elasta QP Resistant Relaxer Kit <input type="checkbox"/> Elasta QP Sensitive Scalp Kit 12 Application Economy Pack <input type="checkbox"/> Elasta QP Sensitive Scalp Kit – 4 Applications <input type="checkbox"/> Elasta QP No Base Crème Relaxer <input type="checkbox"/> Elasta QP SOY OYL No-Base Relaxer <input type="checkbox"/> Elasta QP SOY OYL 4 Application Anti-Dryness No Lye Relaxer Kit <input type="checkbox"/> Elasta QP No-Base Relaxer <input type="checkbox"/> Elasta QP Extra Body No-Base Regular Relaxer <input type="checkbox"/> Elasta QP Extra Body No-Base Super Relaxer <input checked="" type="checkbox"/> Gentle Treatment No-Lye Relaxer Gray Kit <input checked="" type="checkbox"/> Gentle Treatment No-Lye Relaxer <input checked="" type="checkbox"/> Just For Me Relaxer 1 Complete Touch Up Relaxer <input checked="" type="checkbox"/> Just For Me 4 Application Salon Pack Relaxer <input checked="" type="checkbox"/> Just For Me No-Lye Conditioning Crème Relaxer Kit <input checked="" type="checkbox"/> Just For Me No-Lye Conditioning Crème Relaxer Kit with Coil & Curl Cream <input checked="" type="checkbox"/> Just For Me No-Lye Conditioning Crème Relaxer Kit (Super) with Oil Moisturize Lotion <input checked="" type="checkbox"/> Just For Me No-Lye Texture Softener System <input checked="" type="checkbox"/> Just For Me No-Lye Texture Softener System with Hair & Scalp Butter <input checked="" type="checkbox"/> Motions Classic Formula Smooth & Silken Hair Relaxer <input checked="" type="checkbox"/> Motions Professional 12-Application Salon Pack <input checked="" type="checkbox"/> Motions Silkening Shine No Lye Relaxer Kit <input type="checkbox"/> Profectiv MegaGrowth Anti-Damage No-Lye Relaxer 2 Touch Up Application <input type="checkbox"/> Profectiv MegaGrowth Anti-Damage No-Lye Relaxer 1 Complete Touch Up Application <input type="checkbox"/> Profectiv Procision Relaxer Kit Regular <input type="checkbox"/> Profectiv Relax and Refresh Kit Auburn Spice <input type="checkbox"/> Profectiv Relax and Refresh Kit Cherry Fusion <input type="checkbox"/> Profectiv Relax and Refresh Kit Jet Black <input type="checkbox"/> Profectiv Relax and Refresh Kit Mahogany Brown <input type="checkbox"/> Profectiv Relax and Refresh Kit Silky Black



Defendant	Product List (Select All Applicable Products)
	<input type="checkbox"/> Pro-Line Comb Thru Texturizer Kit <input type="checkbox"/> SmartPerm No-Lye Anti-Breakage Relaxer System <input type="checkbox"/> SmartPerm No-Lye Anti-Breakage New Growth Relaxer System, Smart Grow Stimulator <input type="checkbox"/> SmartPerm Smart Valu No-Lye Anti-Breakage Relaxer Kit, 4 Applications <input type="checkbox"/> Smart Perm Smart Valu Smart Gro Stimulator New Growth No-Lye Relaxer with GroRehab 4 Applications <input checked="" type="checkbox"/> S&B® Botanicals™ 2 Application Relaxer <input checked="" type="checkbox"/> S&B® Botanicals™ No-Lye Sensitive Scalp Relaxer, 1-App <input checked="" type="checkbox"/> S&B® Botanicals™ No-Mix Texturizer 2-App, with Deep Conditioner <input checked="" type="checkbox"/> S&B® Botanicals™ No-Mix Texturizer 2-App <input checked="" type="checkbox"/> S&B® Botanicals™ Relaxer 8-Touch Up <input checked="" type="checkbox"/> Soft & Beautiful No-Lye Crème Relaxer <input checked="" type="checkbox"/> Soft & Beautiful No-Lye Ultimate Conditioning Relaxer System <input checked="" type="checkbox"/> TCB Naturals Conditioning Argan Oil Vitamin E & Olive No-Lye Relaxer <input checked="" type="checkbox"/> TCB Naturals Conditioning Argan Oil Vitamin E & Olive No-Lye Relaxer, 2 Applications <input checked="" type="checkbox"/> TCB No-Base Crème Hair Relaxer with Protein & DNA <input type="checkbox"/> UltraSheen Supreme Conditioning No-Lye Relaxer <input type="checkbox"/> UltraSheen Ultra Moisturizing No-Lye Relaxer <input type="checkbox"/> UltraSheen Ultra Moisturizing No-Lye Relaxer, with Keratin <input type="checkbox"/> Other (please specify): _____

7. Other manufacturers/products used by Plaintiff not identified above:

None.

8. Plaintiff's use of Defendants' hair relaxer products caused serious injuries and damages including but not limited to the following:

- ☒ Uterine Cancer
- ☒ Endometrial Cancer
- ☐ Ovarian Cancer
- ☒ Other injuries and/or additional details: Plaintiff's damages are for severe and permanent personal injuries including uterine/endometrial cancer requiring a hysterectomy with bilateral salpingo-oophorectomy, as well as other severe and personal losses which are permanent and lasting as well as, physical pain and mental anguish, including diminished enjoyment of life, as well as the need for lifelong medical treatment, monitoring, medications, fear of recurrent cancer, metastasis of cancer, death from cancer, financial losses, and pain and suffering.

9. Approximate dates of diagnosis of injury, if applicable at this time, that forms the basis of Plaintiff's claims: January 12, 2021 .

**CAUSES OF ACTION AND THEORIES OF RECOVERY ADOPTED AND  
INCORPORATED IN THIS LAWSUIT**

10. Plaintiff hereby adopts and incorporates by reference as if set forth fully herein, all common factual allegations contained in paragraphs 1 through 114 of the Master Long Form Complaint on file with the Clerk of the Court for the United States District Court for the Northern District of Illinois in the matter entitled *In Re: Hair Relaxer Marketing, Sales Practices, and Products Liability Litigation*, MDL No. 3060.

11. Plaintiff hereby adopts and incorporates by reference as if set forth fully herein, the following Causes of Action and the Prayer for Relief within the Master Long Form Complaint on file with the Clerk of the Court for the United States District Court for the Northern District of Illinois in the matter entitled *In Re: Hair Relaxer Marketing, Sales Practices, and Products Liability Litigation*, MDL No. 3060:

- ☒ Count I – Negligence and/or Gross Negligence
- ☒ Count II – Negligent Misrepresentation
- ☐ Count III – Negligence *Per Se*
- ☒ Count IV – Strict Liability: Design Defect
- ☒ Count V – Strict Liability: Failure to Warn
- ☒ Count VI – Breach of Implied Warranty of Merchantability/ Fitness for a Particular Use
- ☒ Count VII – Breach of Express Warranty under state law and the Magnuson-

Moss Warranty Act, 15 U.S.C. § 2301 et seq.

- ☒ Count VIII – Fraud/ Fraudulent Misrepresentation
- ☒ Count IX – Fraudulent Concealment
- ☒ Count X – U.S. State and Territory Statutory Consumer Protection and Unfair or Deceptive Trade Practices Claims
- ☒ Count XI – Unjust Enrichment
- ☐ Count XII – Wrongful Death
- ☐ Count XIII – Survival Action
- ☐ Count XIV – Loss of Consortium
- ☒ Count XV – Punitive Damages
- ☐ Other Causes of Action:

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12. Consortium Claim(s) (if applicable): The following individual(s) allege(s)

damages for loss of consortium: N/A.

13. Survival and/or Wrongful Death Claim(s) (if applicable): The following individual(s) allege(s) damages for survival and/or wrongful death:

N/A.

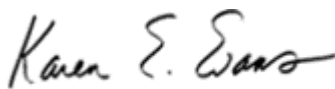
**JURY DEMAND**

Plaintiff demands a trial by jury as to all claims in this action.

Dated this the 13<sup>th</sup> day of September, 2023.

RESPECTFULLY SUBMITTED  
ON BEHALF OF THE PLAINTIFF(S),

OF COUNSEL:



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